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8 **UNITED STATES DISTRICT COURT**
9 **WESTERN DISTRICT OF WASHINGTON**
10 **TACOMA DIVISION**

11 MG PREMIUM LTD, a limited liability
12 company organized under the laws of the
13 Republic of Cyprus,

14 Plaintiff,

15 vs.

16 VASILY KHARCHENKO, an individual and
17 DOES 1-20, d/b/a DAFTSEX.COM,
18 ARTSPORN.COM,

19 Defendants.

Case No.: 3:21-cv-05733-BHS

PLAINTIFF MG PREMIUM LTD'S *EX*
***PARTE* MOTION FOR ENTRY OF**
ORDER OF DEFAULT AGAINST
DEFENDANT VASILY
KHARCHENKO

NOTE FOR MOTION:
July 27, 2022

20 Plaintiff, MG Premium Ltd. (hereinafter "MG Premium" or the "Plaintiff") moves the
21 Court, in accordance with Fed.R.Civ.P. and Local Rule 55(a), for an order of Default against
22 Defendant Vasily Kharchenko.

23 Pursuant to the Court's June 29, 2022 Order Granting Plaintiff's Motion for Leave for
24 Alternative Means of Service [Dkt. No. 16], which provides for service of process by email on
25 Defendant Vasily Kharchenko, the undersigned counsel for Plaintiff on June 29, 2022 served
26 copies of that Order, the First Amended Complaint, and Summons on each of the Defendants at

PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT
[NO. 3:21-cv-05733-BHS]

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FREEMAN LAW FIRM, INC.
1107 ½ Tacoma Avenue South
Tacoma, WA 98042
(253) 383-4500 - (253) 383-4501 (fax)

1 the email addresses on the Summons and in the Order.

2 As of this date, Defendant Vasily Kharchenko has failed to appear, answer, or otherwise
3 plead in the case, the 21-day time prescribed by law for so doing has passed, and he is now in
4 default. Plaintiff respectfully requests the Court to enter an Order of Default against Defendant
5 Vasily Kharchenko.

6 Plaintiff's Motion is supported by the Declaration of Spencer D. Freeman in support of
7 this motion, filed herewith.

8 RESPECTFULLY SUBMITTED this 27th day of July 2022.

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10 **FREEMAN LAW FIRM, INC.**

11 /s/ Spencer D. Freeman

12 Spencer D. Freeman, WSBA#25069
13 Attorneys for Plaintiff
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